

COPY

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

4 -----X

5 NEIL WOODS,

6 Plaintiff,

7 -against-

03 CV 011 (TPG) (MHD)

8 KARL GOODYEAR, INNOVATIONS OF  
9 ROCKLAND, INC., GLORIA HANNA,

10 LEROY ANDREW, SR. and ANGELA BAKER,

Defendants.

11 -----X

12 120 Wall Street

13 : New York, New York

14 March 25, 2004

15 10:45 a.m.

16  
17 DEPOSITION of the Defendant, GLORIA HANNA,  
18 taken by the Respective Parties, pursuant to  
19 Order, held at the above-mentioned time and place,  
20 before Grace Nuccio, a Notary Public of the State  
21 of New York.  
22  
23  
24  
25

## A P P E A R A N C E S:

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\* \* \* \*

-Gloria Hanna-

1  
2 Q Did you happen to notice at the  
3 time that the brake lights were being hit over  
4 those couple of minutes whether animals were in  
5 the road?

6 A No, I didn't notice.

7 Q Can you describe the traffic  
8 conditions that morning as you proceeded  
9 southbound; were they light, medium or heavy or  
10 something else?

11 A Medium.

12 Q Would those be similar conditions  
13 in the right lane?

14 A Was --

15 Q Was the left lane moving at the  
16 same rate of speed as the right lane, or was one  
17 lane moving faster just prior to the accident?

18 A No, I would think they would be  
19 moving the same, about the same.

20 Q Do you have any recollection of  
21 your car and the white car coming into any sort of  
22 contact at any point that morning?

23 A No.

24 Q Do you have any recollection of  
25 your vehicle and any other vehicle coming into

-Gloria Hanna-

1  
2 contact that morning?

3 A Yes.

4 Q The vehicle that you recall coming  
5 into contact with your car, where in proximity to  
6 your car was it; was it in front, behind, on the  
7 side or something else?

8 A Behind.

9 Q Do you know the make or model or  
10 color of that vehicle?

11 A No.

12 Q Just prior to the accident taking  
13 place, the white vehicle in addition to having  
14 brake lights on and off, do you know if the white  
15 vehicle had any type of turn signal on?

16 A No.

17 Q "No" you don't recall; or "no" he  
18 did not?

19 A No, he didn't have the turn signal.

20 Q Do you recall whether you felt an  
21 impact to your vehicle once, twice or more than  
22 twice or something else?

23 A I felt it more than twice -- more  
24 than once, I mean. More than once.

25 Q The white car that was in front of